

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: December 11, 2023 at 2:00 p.m. (ET)
Objection Deadline: December 5, 2023 at 4:00 p.m. (ET)

Re: Docket Nos. 731, 732 & 738

**NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING,
BUT NOT DIRECTING, THE DEBTORS TO REPURCHASE ENDURANCE TRUCKS
FROM CUSTOMERS, AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on November 22, 2023, the debtors and debtors-in-possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief* [Docket No. 731] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that, on November 22, 2023, the Debtors also filed the *Debtors’ Motion to Shorten Notice and Objection Periods for Debtors’ Motion for Entry of an Order (I) Authorizing, But Not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II) Granting Related Relief* [Docket No. 732] (the “**Motion to Shorten**”). **You were previously served with copies of the Motion and Motion to Shorten.**

PLEASE TAKE FURTHER NOTICE that on November 27, 2023, the Court entered the *Order Shortening Notice and Objection Periods for Debtors’ Motion for Entry of an Order (I)*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Authorizing, but not Directing, the Debtors to Repurchase Endurance Trucks from Customers, and (II Granting Related Relief[Docket No. 738].

PLEASE TAKE FURTHER NOTICE that, any responses or objections to the Motion must be in writing and filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **December 5, 2023 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on **December 11, 2023 at 2:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS MOTION, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: November 27, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Do3nald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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